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\*Pro Hac Vice Forthcoming

**UNITED STATES DISTRICT COURT  
DISTRICT OF MONTANA  
GREAT FALLS DIVISION**

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ANA SUDA and MARTHA  
HERNANDEZ,

*Plaintiffs,*

v.

UNITED STATES CUSTOMS AND  
BORDER PROTECTION; CBP  
COMMISSIONER KEVIN K.  
MCALEENAN, in his official  
capacity; CBP AGENT PAUL  
O'NEAL, in his individual and official  
capacities; and  
JOHN DOES 1-25, in their individual  
and official capacities.

*Defendants.*

Civil Action No. 4:19-cv-00010-  
BMM

**DECLARATION UNDER  
PENALTY OF PERJURY OF  
OMAR C. JADWAT**

I, Omar C. Jadwat, pursuant to Local Rule 83.1(d)(3) of the United States District Court for the District of Montana, hereby make the following declaration in support of the attached Motion for Admission Pro Hac Vice in the above referenced case.

1. I am counsel for the plaintiffs and have thorough knowledge of the issues in this matter.
2. I reside in the state of New York and I am the Director of the American Civil Liberties Union Foundation Immigrants' Rights Project. My office address is:

Omar Jadwat  
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New York, NY 10004  
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3. I was admitted to the State Bar of New York (Bar No. 4118170) on February 3, 2003 and remain in good standing in every jurisdiction in which I am admitted to practice.
4. I am proficient in electronic filing in other federal district courts, including the United States District Court for the Eastern and Southern Districts of New York.
5. I am admitted to practice before the U.S. District Courts for the Southern District of New York (admitted 2003), Eastern District of New York

(2017), and the District of Colorado (2010); the U.S. Courts of Appeals for the First (2014), Second (2005), Third (2007), Fourth (2012), Fifth (2005), Eighth (2008), Ninth (2008), and Eleventh Circuits (2011), and the U.S. Supreme Court (2010).

6. I have not been disciplined by any state or federal bar and there are no disciplinary proceedings pending against me as a member of the bar in any jurisdiction.
7. I have never been held in contempt, otherwise disciplined by any court for disobedience to its rules or orders, or sanctioned under Fed. R. Civ. P. 11 or 37(b), (c), (d) or (f) or the state equivalent.
8. I have neither concurrently nor within the two years preceding the date of this application made any *pro hac vice* application to this Court.
9. I fully understand that my *pro hac vice* admission in this court is personal to me only and that I will not be held fully accountable for the conduct of the litigation in this Court.

I declare under penalty of perjury that the foregoing is true and correct.

Executed this 14th day of February, 2019.

  
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Omar C. Jadwat